

# **Exhibit I**

**From:** [Allison McGuire](#)  
**To:** [Greim, Edward D.](#)  
**Cc:** [Alex Spiro](#); [Donnelli, Jennifer](#); [Badell, Rebekah](#)  
**Subject:** RE: Eastern Profit Corporation Limited v. Strategic Vision US LLC  
**Date:** Thursday, November 21, 2019 4:50:16 PM

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Eddie,

Thanks for your accommodation. We are happy to discuss the conditions for a potential deposition of Mr. Bannon on December 5. To date, however, you have not clearly articulated any basis for why Mr. Bannon—a non-party—is relevant to this proceeding or what information he possesses that cannot be gained through party discovery. Please explain your basis for wanting to depose Mr. Bannon so we can better understand the nature of your request and the scope of your subpoena. Once we have that information, we will be in a better position to determine the appropriateness of a deposition on December 5.

Best,  
Allison

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**From:** Greim, Edward D. [mailto:EDGreim@gravesgarrett.com]  
**Sent:** Thursday, November 21, 2019 4:55 PM  
**To:** Allison McGuire <allisonmcguire@quinnemanuel.com>  
**Cc:** Alex Spiro <alexspiro@quinnemanuel.com>; Donnelli, Jennifer <JDonnelli@gravesgarrett.com>; Badell, Rebekah <RBadell@gravesgarrett.com>  
**Subject:** Re: Eastern Profit Corporation Limited v. Strategic Vision US LLC

[EXTERNAL EMAIL]

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Ms. McGuire, you stated none of this on our call, nor did you raise any timing issues on our first call back on Monday. I asked you to call me back this afternoon and I gave you my exact schedule to the minute. I also offered to get on a call with the court. Instead, you waited past the time I told you I would be driving to the airport, and sent an email instead. Further, you never said you had inadequate prep time or stated the witness was actually unavailable, and public statements by him show that he is. We will treat this as a last minute no-show. We also confirm the December 5 date you proposed on our last call as a backup in case you were unable to reach your client. We trust that extra time satisfies your represented need to prep him. Please produce him at 9am at the same place noted in the subpoena.

Eddie

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**From:** Allison McGuire <[allisonmcguire@quinnemanuel.com](mailto:allisonmcguire@quinnemanuel.com)>  
**Sent:** Thursday, November 21, 2019, 3:01 PM  
**To:** Greim, Edward D.  
**Cc:** Alex Spiro

**Subject:** RE: Eastern Profit Corporation Limited v. Strategic Vision US LLC

Mr. Greim –

As discussed on our call this afternoon, you did not provide us with reasonable notice to prepare Mr. Bannon, a nonparty to this proceeding, for a deposition. As I stated, Mr. Bannon will not appear tomorrow. In addition you've failed to adhere to SDNY Local Civil Rule 26.4(a), which requires counsel to "cooperate with each other, consistent with the interests of their clients, in all phases of the discovery process and to be courteous in their dealings with each other, including in matters relating to scheduling and timing of various discovery procedures." Please feel free to contact with me any questions or concerns.

Best,  
Allison

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**From:** Greim, Edward D. [<mailto:EDGreim@gravesgarrett.com>]  
**Sent:** Monday, November 18, 2019 3:23 PM  
**To:** Allison McGuire <[allisonmcguire@quinnemanuel.com](mailto:allisonmcguire@quinnemanuel.com)>  
**Cc:** Alex Spiro <[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>  
**Subject:** Re: Eastern Profit Corporation Limited v. Strategic Vision US LLC

[EXTERNAL EMAIL]

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Allison, I am traveling and will try you now.

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**From:** Allison McGuire <[allisonmcguire@quinnemanuel.com](mailto:allisonmcguire@quinnemanuel.com)>  
**Sent:** Monday, November 18, 2019 12:14:44 PM  
**To:** [edgreim@gravesgarrett.com](mailto:edgreim@gravesgarrett.com) <[edgreim@gravesgarrett.com](mailto:edgreim@gravesgarrett.com)>  
**Cc:** Alex Spiro <[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>  
**Subject:** Eastern Profit Corporation Limited v. Strategic Vision US LLC

Mr. Greim –

We understand that you've issued a deposition subpoena to Steve Bannon on behalf of Strategic Vision in the above referenced case. Please let us know when you have a moment to discuss.

Thanks,  
Allison

**allison mcguire** | associate

quinn emanuel urquhart & sullivan, llp

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